

Exhibit 1

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October 24, 2024

VIA EMAIL

Jessica Davidson, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
One Manhattan West
New York, New York 10001

RE: *In re Valsartan Products Liability Litigation, No. 1:19-md-02875*

Dear Jessica:

The Court ordered Plaintiffs to take Jinsheng Lin's deposition in anticipation for his trial testimony. In preparation for that deposition, Plaintiffs have reviewed ZHP's document production for policies or procedures that would allow for the destruction of his custodial file from November 2017 and earlier; however, Plaintiffs have been unable to find such documents. Please identify those documents or produce them immediately.

Plaintiffs have also reviewed ZHP's document production for the certificates of analysis and material safety data sheets from its dimethylformamide, triethylamine, and triethylamine hydrochloride suppliers. Plaintiffs have not been

Jessica Davidson, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
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able to find these documents in the production. Please identify the suppliers' certificates of analysis and material safety data sheets for the entire relevant time period in the production, or produce them immediately.

If you are unwilling to provide any of these documents/identify them in the production if already produced, please advise so we can submit the issue to Judge Vanaskie for resolution.

Thank you,



ADAM M. SLATER